

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THE BANK OF NEW YORK MELLON FKA)
THE BANK OF NEW YORK, AS TRUSTEE)
FOR THE CERTIFICATEHOLDERS OF)
CWALT, INC., ALTERNATIVE LOAN)
TRUST 2007-AL1, MORTGAGE PASS-)
THROUGH CERTIFICATES SERIES 2007-)
AL1, a New York corporation,)

Case No. 3:17-cv-00115-LRH-VPC

Plaintiff,)

vs.)

HIGHLAND RANCH HOMEOWNERS)
ASSOCIATION, a Nevada corporation;)
AIRMOTIVE INVESTMENTS, LLC, a Nevada)
limited liability company; LETICIA RANGEL)
DE LOPEZ, an individual; LUIS LOPEZ-)
LANDEROS, an individual; DOES 1 through)
10, inclusive, and ROES 1 through 10,)
inclusive,)

Defendants.)

STIPULATION AND ORDER TO EXTEND TIME TO
RESPOND TO MOTION FOR SUMMARY JUDGMENT
(Second Request)

COMES NOW Plaintiff, THE BANK OF NEW YORK MELLON FKA THE BANK OF

1 NEW YORK, AS TRUSTEE FOR THE CERTIFICATEHOLDERS OF CWALT, INC.,
2 ALTERNATIVE LOAN TRUST 2007-AL1, MORTGAGE PASS-THROUGH CERTIFICATES
3 SERIES 2007-AL1, and Defendant, AIRMOTIVE INVESTMENTS, LLC, by and through their
4 undersigned counsel, and hereby stipulate and agree as follows:

- 5 1. On April 25, 2018, Plaintiff filed a Motion for Summary Judgment herein [ECF
6 #34].
- 7 2. On June 1, 2018, the parties submitted a stipulation to extend the deadline to
8 respond to the Motion for Summary Judgment until June 15, 2018. [ECF #37].
9 Said Stipulation was granted on June 4, 2018. [ECF #38].
- 10 3. Defendant's counsel has been required to devote time and attention to numerous
11 other pending legal matters since the filing of the Motion for Summary Judgment
12 which detracted from the time available prepare a response.
- 13 4. In addition, since the granting of the first extension, Defendant's counsel suffered
14 a family emergency that necessitated significant time out of the office. This has
15 created a backlog of work.
- 16 5. Based upon the foregoing, Defendant has requested and shall be granted a further
17 extension of time until July 16, 2018, in which to respond to the Plaintiff's
18 Motion for Summary Judgment.

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 6. Plaintiff shall have an extended period of time until August 16, 2018, in which to
2 file any Reply.

3 7. This Stipulation is made in good faith and not for purpose of delay.

4 Dated this 15th day of June, 2018.

5 ROGER P. CROTEAU &
6 ASSOCIATES, LTD.

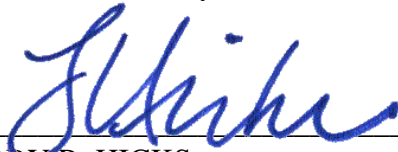
AKERMAN LLP

7 /s/ Timothy E. Rhoda
8 TIMOTHY E. RHODA, ESQ.
9 Nevada Bar No. 7878
10 9120 West Post Road, Suite 100
11 Las Vegas, Nevada 89148
12 (702) 254-7775
13 croteaulaw@croteaulaw.com
14 Attorney for Defendant
15 Airmotive Investments, LLC

16 /s/ William S. Haldas
17 WILLIAM S. HABDAS, ESQ.
18 Nevada Bar No. 13138
19 1635 Village Center Circle, Suite 200
20 Las Vegas, NV 89134
21 (702) 634-5000
22 william.haldas@akerman.com
23 Attorney for Plaintiff
24 Bank of New York Mellon

25 **IT IS SO ORDERED** , *nunc pro tunc*.

26 DATED this 18th day of June, 2018.

27 
28 LARRY R. HICKS
UNITED STATES DISTRICT JUDGE